

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

JUAN JOSE PERAZA MORA and GLORIA
ESTHER BATISTA MOLINA,

Debtors.

Chapter 12

Case No. 19-01896(ESL)

MOTION SUBMITTING EXHIBIT TO SETTLEMENT AGREEMENT

**TO THE HONORABLE ENRIQUE S. LAMOUTTE
U.S. BANKRUPTCY JUDGE:**

COME NOW, Triangle Cayman Asset Company, LLC (“Triangle”), and Juan J. Peraza Mora & Gloria E. Batista Molina (the “Debtors”, together with Triangle, the “Parties”), through their respective undersigned counsel, and very respectfully state and pray as follows:

1. After lengthy negotiations, the Debtors and Triangle reached an agreement as to the treatment to be provided under Debtors’ plan of reorganization. To this end, the parties, executed a Settlement Agreement (the “Settlement Agreement”).

2. On April 23, 2020, the Debtors filed a *Motion Submitting Stipulation for the Treatment of Claim for Secured Creditor, Triangle Cayman Asset Company* (the “Motion”), including the Settlement Agreement as “Exhibit 1” to the Motion. See Docket Nos. 148 and 148-1.

3. The Settlement Agreement, in turn, refers to “Exhibit A”, which is the Judgment entered by the PR District Court for the District of Puerto Rico, in Civil Case No. 17-01216-CCC, in favor if Triangle.

4. By inadvertence, Exhibit A was not included as exhibit to the Settlement Agreement, filed at Docket No. 148. Therefore, the Parties herein include **Exhibit A** to the Settlement Agreement.

5. For the reasons stated above, Triangle respectfully requests that this Court takes notice of the above stated and that Exhibit A to the Settlement Agreement, included herein, be considered an integral part of Docket No. 148.

WHEREFORE, the Parties respectfully request that this Court to take notice of “Exhibit A” to the Settlement Agreement, which is being included herein, and that the same be considered an integral part of Docket No. 148.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 5th day of May 2018.

WE HEREBY CERTIFY that a copy of this MOTION has been served electronically through the CM/ECF system to: The US Trustee for the District of Puerto Rico, The Chapter 12 Trustee JOSE CARRION and to all attorneys and creditors that have filed a notices of appearance in the case. All non-CM/ECF participants will be notified by first class mail as per the Master Address List included herein.

Homel A. Mercado Justiniano, Esq.
Attorneys for Debtors
Calle Ramírez Silva #8
Ensanche Martinez,
Mayagues, PR 00680
Tel: (787) 831-2577; (787) 805-2945
Fax: (787) 805-7350

/S/ Homel A. Mercado-Justiniano
USDC-PR No. 229705
Hmjlaw2@gmail.com
hmjlaw@yahoo.com

O’NEILL & BORGES, LLC
Attorneys for Triangle Cayman Asset Company
250 Muñoz Rivera Avenue Suite 800
San Juan, Puerto Rico 00918-1813
Tel: (787) 764-8181
Fax: (787) 753-8944

s/ Hermann D. Bauer, Esq.
Hermann D. Bauer, Esq.
USDC No. 215205
herman.bauer@oneillborges.com

/S/ Martha L. Acevedo-Peñuela
Martha L. Acevedo-Peñuela
USDC-PR No. 300501
martha.acevedo@oneillborges.com